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12 *Attorneys for Plaintiff Dan Clarke*

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**
15

16 DAN CLARKE,

17 Plaintiff,

18 vs.

19 PACIFIC GAS AND ELECTRIC COMPANY; and
20 PG&E CORPORATION

21 Defendants.
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Case No. 14-cv-04393-WHO

**JOINT STIPULATION TO
CONTINUE DEFENDANTS'
MOTION TO DISMISS SECOND
AMENDED COMPLAINT, TO
STRIKE AND FOR SANCTIONS
AND EXTEND TIME TO FILE
OPPOSITION AND REPLY
THERE TO; [PROPOSED] ORDER**

RECITALS

WHEREAS, on March 18, 2020, Clarke filed his Second Amended Complaint (“SAC”);

WHEREAS, on April 1, 2020, PG&E filed a Motion to Dismiss Clarke’s SAC, to Strike and For Sanctions (“Motion to Dismiss”), and set a hearing for May 7, 2020;

WHEREAS, pursuant to Local Rule 7-3, Clarke’s opposition to the Motion to Dismiss would be due on April 15, 2020, and PG&E’s reply would be due on April 22, 2020; and

WHEREAS, the Parties agree to a two-week extension of Clarke’s time to oppose the Motion to Dismiss and a one-week extension of PG&E’s time to reply; and

WHEREAS, the undersigned counsel for Defendants has consented to the undersigned counsel for Plaintiff signing the instant stipulation on his behalf.

NOW, THEREFORE, Pursuant to Civil Local Rule 6-1(b), the Parties stipulate and agree as follows, subject to the Court’s approval:

STIPULATION

1. Clarke will file his Opposition to PG&E’s Motion to Dismiss on or before April 29, 2020;

2. PG&E will file its Reply in support of Motion to Dismiss on or before May 13, 2020;

3. The May 7, 2020 hearing on PG&E’s Motion to Dismiss is hereby continued to May 28, 2020 at 10:30 a.m., or the Court’s next available date.

DATED: April 3, 2020

WFBM, LLP

By: /s/ Scott D. Mroz

SCOTT D. MROZ

ATTORNEYS FOR PACIFIC GAS AND
ELECTRIC COMPANY AND PG&E
CORPORATION

1 DATED: April 3, 2020

GROSS & KLEIN LLP

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3 By: /s/ Stuart G. Gross

4 STUART G. GROSS
ATTORNEYS FOR DAN CLARKE

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8 **ORDER**

9 PURSUANT TO STIPULATION, as modified IT IS SO ORDERED. The hearing will be
10 on May 27, 2020 at 2:00 p.m.

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12 Dated: April 3, 2020

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The Honorable Judge William H. Orrick